

John van Loben Sels (State Bar No. 201354)  
**WANG, HARTMANN, GIBBS & CAULEY, P.L.C.**  
2570 W. El Camino Real, Suite 440  
Mountain View, California 94040  
johnvanlobensels@whgclaw.com  
Telephone: (650) 209-1230  
Facsimile: (650) 209-1231

Peter A. Sullivan (New York State Bar No. 2563039)  
**HUGHES HUBBARD & REED LLP**  
One Battery Park Plaza  
New York, New York 10004  
[sullivan@hugheshubbard.com](mailto:sullivan@hugheshubbard.com)  
Telephone: (212) 837-6000  
Facsimile: (212) 422-4726

Gregory M. Williams (District of Columbia Bar No. 467950)  
**HUGHES HUBBARD & REED LLP**  
1775 I Street, N.W., Suite 600  
Washington, D.C. 20006  
williamg@hugheshubbard.com  
Telephone: (202) 721-4600  
Facsimile: (202) 721-4646

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
SAN DIEGO DIVISION**

# **GABRIEL TECHNOLOGIES CORPORATION and TRACE TECHNOLOGIES, LLC.**

#### **Plaintiffs.**

VS.

**QUALCOMM INCORPORATED,  
SNAPTRACK, INC., and NORMAN  
KRASNER.**

## Defendants

**CIVIL ACTION NO. 3:08-cv-01992-AJB-MDD**

**PLAINTIFFS' NOTICE OF MOTION AND  
MOTION FOR AN ORDER TO SUBMIT  
CERTAIN DOCUMENTS UNDER SEAL**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

**PLEASE TAKE NOTICE** that on August 10, 2012 in Courtroom 5 of the above-captioned Court, located at 880 Front Street, San Diego, California, Plaintiffs Gabriel Technologies Corporation and Trace Technologies, LLC (collectively "Plaintiffs"), will and hereby do move the Court for an order permitting the filing under seal Plaintiffs Motion to Exclude Opinion Testimony of Apostolos K. Kakaes, Ph.D., the Declaration of Ronald Abramson in support of Plaintiffs Motion to Exclude Opinion Testimony of Apostolos K. Kakaes, Ph.D., and the Declaration of Anant Sahai in support of Plaintiffs Motion to Exclude Opinion Testimony of Apostolos K. Kakaes, Ph.D., along with their accompanying exhibits.

This Motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, all records and papers on file in this action, and any evidence or oral argument offered at any hearing on this Motion.

Dated: August 10, 2012

WANG, HARTMANN, GIBBS & CAULEY, P.L.C.  
HUGHES HUBBARD & REED LLP

*/s/ John van Loben Sels*

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John van Loben Sels

Peter A. Sullivan